

PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP
2001 K STREET, NW
TELEPHONE (202) 223-7300

WASHINGTON, DC 20006-1047

1285 AVENUE OF THE AMERICAS
NEW YORK, NY 10019-6064
TELEPHONE (212) 373-3000

UNIT 3601, OFFICE TOWER A
BEIJING FORTUNE PLAZA
NO. 7 DONGSANHUAN ZHONGLU
CHAOYANG DISTRICT
BEIJING 100020
PEOPLE'S REPUBLIC OF CHINA
TELEPHONE (86-10) 5828-6300

12TH FLOOR, HONG KONG CLUB BUILDING
3A CHATER ROAD, CENTRAL
HONG KONG
TELEPHONE (852) 2846-0300

ALDER CASTLE
10 NOBLE STREET
LONDON EC2V 7JU, U.K.
TELEPHONE (44 20) 7367 1600

FUKOKU SEIMEI BUILDING
2-2 UCHISAIWAICHO 2-CHOME
CHIYODA-KU, TOKYO 100-0011, JAPAN
TELEPHONE (81-3) 3597-8101

TORONTO-DOMINION CENTRE
77 KING STREET WEST, SUITE 3100
P.O. BOX 226
TORONTO, ONTARIO M5K 1J3
TELEPHONE (416) 504-0520

500 DELAWARE AVENUE, SUITE 200
POST OFFICE BOX 32
WILMINGTON, DE 19899-0032
TELEPHONE (302) 655-4410

WRITER'S DIRECT DIAL NUMBER

(202) 223-7356

WRITER'S DIRECT FACSIMILE

(202) 204-7356

WRITER'S DIRECT E-MAIL ADDRESS

kgallo@paulweiss.com

August 6, 2015

By ECF and Hand Delivery

The Honorable William H. Pauley III
United States District Judge
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, NY 10007-1312

The Dial Corporation, et al. v. News Corporation, et al.,
No. 13-cv-06802 (WHP) (S.D.N.Y.)

Dear Judge Pauley:

We write jointly on behalf of all parties in the above-referenced matter to memorialize a stipulation and agreement ("Stipulation") between the parties concerning the deposition of witnesses designated by the parties as potential witnesses for trial. The Stipulation provides that, under certain circumstances, if a party includes on its witness list in the Joint Pre-Trial Order a witness who has not previously been deposed during discovery in this case, the opposing party will be afforded the opportunity to depose such witness, and no party will object to such a deposition as untimely.

The parties respectfully request that the Court So Order this stipulation and agreement, which is attached as Exhibit A to this letter.

We stand ready to discuss any questions the Court may have regarding this request.

The Honorable William H. Pauley III

2

Respectfully submitted,

By: /s/ Lindsey Godfrey Eccles
Lindsey Godfrey Eccles
SUSMAN GODFREY LLP
1201 Third Avenue, Suite 3800
Seattle, WA 98101-3000
Telephone: (206) 516-3880
Email: leccles@susmangodfrey.com
Attorneys for Plaintiffs

By: /s/ Kenneth A. Gallo
Kenneth A. Gallo
PAUL, WEISS, RIFKIND,
WHARTON & GARRISON LLP
2001 K Street, N.W.
Washington, DC 20006-1047
Telephone: (202) 223-7356
Email: kgallo@paulweiss.com
Attorneys for Defendants